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By Electronic Filing and Hand Delivery

Magalie Roman Salas, Secretary
Office of the Secretary
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Washington, DC 20554

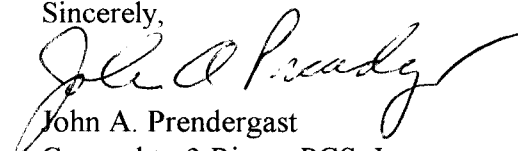
**Re: 3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless
Second Quarterly TTY Implementation Report
CC Docket 94-102**

Dear Ms. Salas:

On behalf of 3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless ("3 Rivers") and pursuant to the directive contained in the Commission's *Fourth Report and Order* in CC Docket No. 94-102, FCC 00-436 (*rel.* December 14, 2000), we are transmitting herewith the original and four copies of its "Second Quarterly Report" concerning TTY digital deployment. Pursuant to the Commission's instructions, we are also submitting this report through the Commission's Electronic Comment Filing System.

Please refer any inquiries or correspondence in connection with this matter to our offices.

Sincerely,


John A. Prendergast
Counsel to 3 Rivers PCS, Inc.
d/b/a 3 Rivers Wireless

Attachment
cc (w/att.): Kris Monteith
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ITS

**3 RIVERS PCS, INC. d/b/a
3 RIVERS WIRELESS
P.O. BOX 3387
GREAT FALLS, MONTANA 59403-3387**

Magalic Roman Salas, Secretary
Federal Communications Commission
Washington, D.C. 20554

**Re: CC Docket No. 94-102
Broadband PCS Station WPOI209
Second Quarterly Report**

Dear Ms. Salas:

This report is filed pursuant to the Commission's *Fourth Report and Order*, in CC Docket No. 94-102, released December 14, 2000.

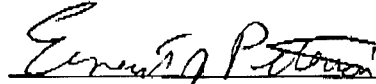
3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless (3 Rivers) is the licensee of station WPOI209 in the Broadband Personal Communications Service (PCS). Station WPOI209 is a license partitioned from the 30 MHz Block A license granted to GTE Macro Communications Corporation (GTE), on June 23, 1995, for the Spokane-Billings Major Trading Area (MTA). On April 17, 1997, the Commission approved the application to partition to 3 Rivers a portion of GTE's license for the Spokane-Billings MTA, to include the Great Falls, Billings, Bozeman, Helena and Butte (except for Powell County) Basic Trading Areas. 3 Rivers utilizes Nortel's CDMA equipment for its PCS network.

We are continuing to follow the progress of the Wireless TTY Forum and are continuing to work with our switch supplier, Nortel Networks, toward effecting compliance with the Commission's requirements for providing TTY access to E-911 calling systems over our PCS facilities. There has been no significant progress to report as of June 30, 2001, beyond that reported in our first quarterly filing, a copy of which is attached hereto for convenient reference.

Respectfully submitted,

**3 Rivers PCS, Inc. d/b/a
3 Rivers Wireless**

By:


Officer

Dated: July 13, 2001

**3 Rivers PCS, Inc. d/b/a 3 Rivers Wireless
E911 TTY Device Capability Report March 31, 2001**

Development Activities

- 1) **Network Infrastructure Software Development** – We have requested information from our equipment vendor, Nortel. They have been unable to provide any information on the deployment date for any part of the software. We have opened an Action Register with Nortel and this is currently one of the key items that remains and is being researched.
- 2) **Handset Development and Testing Plans** – Currently there appears to be an accessory based solution that is offered by Nokia, but the FCC is not accepting an accessory based solution. Our main handset manufacturer is Kyocera/Qualcomm. At this time they do not have anything in the works to deploy a handset that will be capable for the TTY technology. We have also contacted Motorola and found that they are in the infancy stages of making any sort of progress with this technology.
- 3) **Beta Testing and Lab Testing** – We will be looking forward to beta testing any of the handsets that will become available. There is also a technology limitation on the network side being as the equipment vendors have not been able to come forward with a deployment date for any part of this new technology. As equipment becomes available from vendors we will then begin our testing process.
- 4) **Release and General Availability to Carriers of Network Infrastructure Software** – Unable to determine a firm date at this time with any manufacturer or vendor.
- 5) **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
- 6) **Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY** – We have been pushing our equipment vendor to learn a date for the general availability of the software and any peripheral equipment. We have done this by opening an Action Register to track the progress of this item throughout the research stage. We have also made contact with a third party vendor (TCS) to find if this can be a peripheral solution provided by somebody else other than our equipment vendor. At this time we have made no progress with either of these avenues on the network side. 3 Rivers has also contacted our main

handset manufacturers to see what the progress would be on the handset side as we ramp up for TTY deployment. Nokia has developed an unusable solution in the accessory market. Motorola is researching the issue and beginning to move to work on a TTY capable handset. Kyocera has told us that this is an issue that they have not begun to look at. In an additional effort to stay ahead of the curve we have had one of our people assigned to the Montana State 911 Advisory Council. This will be one of the items that will be brought up in the next council meeting. We feel that this will give us a good platform to work not only with local government but also industry people and PSAPs facing the same challenges.

Testing and Deployment Activities

- 7) **Carrier Coordination of Testing with PSAP** – 3 Rivers will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis.
- 8) **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed. At that point we will be ready to begin testing activities.
- 9) **Retail Availability of Necessary Consumer Equipment** – Unable to determine the retail availability of consumer equipment, as none of the handset manufacturers has been able to release a date for general availability.
- 10) **Geographic Scope of Network Infrastructure Deployment** – The geographic scope of deployment is undetermined at this time. In our rural area we have found that some of the PSAPs do not have the capability of accepting Wireless Enhanced 911 features. The most likely scenario would be to place the service in the areas that would be capable of handling Enhanced 911 features.